

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**GREENWICH INSURANCE
COMPANY,**

Plaintiff/Counter-Defendant,

v.

**US ALL STAR FEDERATION d/b/a
IASF,**

Defendant/Counter-Plaintiff.

Case No. 2:23-cv-02285-JTF-atc

**U.S. ALL STAR FEDERATION, INC.’S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO RESPOND TO THE FIRST AMENDED COMPLAINT**

Defendant/Counter-Plaintiff U.S. All Star Federation, Inc.¹ (“USASF”), pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, respectfully moves the Court to extend the deadline for USASF to respond to Greenwich Insurance Company’s (“Greenwich”) First Amended Complaint. USASF requests that this response deadline be extended to December 1, 2023. Plaintiff does not oppose this motion. As good cause for this Motion, USASF states the following:

1. Greenwich’s First Amended Complaint in this matter was filed on October 31, 2023. (ECF No. 34).
2. USASF’s current deadline for filing a response to the First Amended Complaint is November 14, 2023.
3. USASF requires additional time to thoroughly respond to the First Amended Complaint.

¹ The correct corporate name for USASF is U.S. All Star Federation, Inc. Further, Defendant USASF does not operate as “IASF.” See Business Entity Detail on file with the Tennessee Secretary of State, *available at* <https://tnbear.tn.gov/Ecommerce/FilingDetail.aspx?CN=244072134130140158198177254207251034089217074053>

4. USASF's request for an extension to respond to the First Amended Complaint until December 1, 2023 is reasonable and is not being filed for purposes of delay or for any other unjust purpose.

WHEREFORE, USASF respectfully requests that the Court enter an order granting an extension through December 1, 2023 of the time within which USASF may respond to the First Amended Complaint.

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

/s/ Mary Wu Tullis

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CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(1)(B), the undersigned hereby certifies that Mary Wu Tullis, counsel for USASF, met and conferred with counsel for Greenwich, Kristen Kish, on November 13, 2023, via email and telephone. Counsel for Greenwich stated that Greenwich does not oppose this Motion provided that, per the Parties' discussion, all other deadlines of the scheduling order (ECF No. 28) will be extended without a specific deadline until such time that the Parties agree to new deadlines.

s/Mary Wu Tullis

CERTIFICATE OF SERVICE

I hereby certify that on this day, November 13, 2023, a copy of the foregoing Motion was filed electronically. Notice of this filing will be served by operation of the Court's electronic filing system to all counsel of record.

s/Mary Wu Tullis
